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July 9, 2021

VIA ECF

Hon. Paul G. Gardephe
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *L.M. obo J.M. v. N.Y.C. Dep't of Education*, 21-cv-1733 (PGG)(SN)

Dear Judge Gardephe:

I am a Special Assistant Corporation Counsel in the office of Acting Corporation Counsel, Georgia Pestana, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request a 6-week extension of Defendant's time to respond to the complaint, from July 14, 2021 to August 25, 2021. I am also requesting that the August 19, 2021 conference be adjourned to one of the following dates: September 22, 24 or 28, 2021.

Plaintiff consents to this extension of the time to answer. This is the third request for an extension of the time to answer. The first request was made on April 2, 2021 and granted by Your Honor on April 6, 2021. The second request for an extension was made on June 11, 2021 and granted by Your Honor on June 14, 2021. The requested 6-week extension will provide the parties with additional time to negotiate, now that Defendant has made a settlement offer. We are hopeful that the parties will settle this matter without the need for further burden on the Court's time.

Accordingly, Defendant respectfully requests that its time to respond to the complaint be extended to August 25, 2021, and the August 18, 2021 conference be adjourned to September 22,

24 or 28, 2021.

Thank you for considering this request.

Respectfully submitted,

/s/

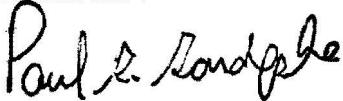
Martha Nimmer
Special Assistant Corporation Counsel

cc: Irina Roller, Esq. (via ECF)

MEMO ENDORSED

The application is granted. Defendant will respond to the Complaint by August 25, 2021. The status conference previously scheduled for August 19, 2021 is adjourned to September 22, 2021 at 10:00 a.m.

SO ORDERED.



Paul G. Gardephe
United States District Judge

July 12, 2021